

1 was nodding, you know, like -- I guess, you  
2 know, it was just surprising to him, too.  
3 He ended up leaving, going back down to the  
4 cell. He didn't say nothing to me. After I  
5 said all that and he did that, he walked  
6 straight back down to the other cell.

7 I called Sergeant Lejeay back, and I  
8 said basically the same thing, you know,  
9 where is that in the handbook. I need a  
10 doctor. My head hurts. I'm all messed up.  
11 And she said, we're getting you a doctor,  
12 we're going to call one down here, you know,  
13 one is on their way. And she had left and  
14 went back down to the other cell.

15 And they left after that. I had  
16 stayed in my cell. I had laid down for a  
17 minute. I was pushing my emergency buttons.  
18 None of those buttons work in that whole  
19 B-D. You can push those buttons for as long  
20 as you want to; nobody is coming.

21 And about 1:30 in the morning,  
22 Sergeant Drexil comes around. He's not  
23 identified in my complaint because I'm not  
24 suing him. And he had heard about what had  
25 went on. He wasn't no stranger to this kind

1 of thing. He had come down knowing full  
2 well what had happened. He had came down  
3 there specifically to see how we were doing  
4 after this whole thing had happened.

5 And the other inmate had bruises all  
6 over him. I had my bruises. I had a big  
7 old lump on the back of my head from where  
8 the dude had been hitting me. My nose and  
9 my face was messed up. I had, you know, a  
10 line on my neck from where I had been  
11 choked.

12 And he was, like, I'm getting you  
13 guys a doctor right now. Ten minutes later,  
14 a doctor was there taking, you know, your  
15 notes, examining us, giving us Band-Aids and  
16 medicine and this kind of thing. She  
17 couldn't really do too much because it was  
18 in the middle of the night, so she did  
19 everything she could do. And I had got all  
20 my stuff taken care of, and she had gave  
21 me --

22 Q. What time are we talking about?  
23 When was this? What's the best thing you  
24 recall?

25 A. It was dark outside.

1 Q. I'm talking about what month.

2 A. November, I believe.

3 Q. Of 2003 or 2002?

4 A. 2002. This was like a month after,  
5 you know, the final situation of the  
6 property stuff. And, I mean, stuff happens  
7 in there like -- (INDICATING) -- you know  
8 what I'm saying?

9 So after that, I had been seeing the  
10 doctor regularly after that. She had, you  
11 know, did whatever she did to have me  
12 checked up, and I had my regular checkups  
13 and that kind of thing. That was the --  
14 that's the occurrence that happened on that  
15 time.

16 Now, before this, I had already seen  
17 all of these officers act violent towards  
18 inmates except for Clark. I felt threatened  
19 by him, but I didn't think that he would go  
20 that far with it because he had just got  
21 there, anyway. So I did complain about him,  
22 but the other officers I really complained  
23 about as far as my immediate fear of threat  
24 against, you know, Rogers, Woolard and --  
25 I'm trying to think of the little short

1 cell until the next morning. I was so  
2 pissed, I couldn't -- I went straight to  
3 that phone when they let me out, and I  
4 called my people, the same people I had call  
5 internal affairs last time. I had them -- I  
6 told them everything that had went on. And  
7 they had -- they addressed it harder than  
8 maybe the last time, because last time it  
9 took them a couple of days to come and take  
10 pictures of me. This time it took them --  
11 it wasn't 30 minutes after I got off the  
12 phone, internal affairs was down there  
13 taking pictures.

14 And the dude, when he came down,  
15 started talking to me like I was being  
16 aggressive and like I was threatening them  
17 in some kind of way. And, man, I was like,  
18 look, dude, I don't know what you're talking  
19 about right now. Because he was saying, you  
20 ain't going to jump on us, are you.

21 Q. Who was that?

22 A. I don't know his name. If I seen  
23 his picture -- he's a captain, though. And  
24 I believe he works up there, and he's in  
25 internal affairs or in the investigation

1 department upstairs.

2 And he was telling me, you ain't  
3 going to jump on me, are you; you ain't  
4 going to jump on us, are you; this and that,  
5 that kind of thing, talking to me like, you  
6 know, like I'm a threat like that. You know  
7 what I'm saying? And I said, no, man, I  
8 ain't going to jump on nobody. I just need  
9 a doctor, you know. Take your pictures, do  
10 what you got to do, and, you know, let's get  
11 this stuff going because I'm not okay here.

12 And, you know, it was pretty much  
13 over after that. He didn't have too much to  
14 say. They took about four or five pictures,  
15 about six pictures, different angles, this  
16 and that.

17 And I had seen a doctor regularly  
18 after, I'm talking about every single day  
19 after that for, like, the next couple of  
20 weeks I had a seen a doctor. And I  
21 remember, once we were in medical, Townsend  
22 was -- had been the one to take me down  
23 there one day. And I believe that's exactly  
24 him, Townsend. And I said, look, I've been  
25 shot, you know. I was telling her about, I

1 don't got no feeling right here in my leg,  
2 where they had shot me. And it was real  
3 bad. It's not that bad anymore. It was  
4 real bad scar tissue up in there. And she  
5 told me, oh, you're not going to have any  
6 feeling for, you know, a couple of weeks.  
7 Well, I haven't got feeling back yet.

8 And when Townsend was up in there,  
9 she was kind of coming at me like, you know,  
10 it might have been my fault, too. And  
11 Townsend set her straight right there. He  
12 said, look, I seen the whole thing, the dude  
13 didn't do nothing. He came out of his cell,  
14 and they immediately jumped on him. After  
15 that, they shot him and kicked him and  
16 dragged him over to the wall.

17 The doctor didn't have nothing to  
18 say after that, you know. She was just  
19 filling in her reports and that kind of  
20 thing. And after that, man, that was pretty  
21 much the end of that whole situation. A  
22 couple of people went to the hospital that  
23 night. I wasn't the one that ended up going  
24 to the hospital. I wasn't one of them,  
25 anyway. Many people had been shot that